IN THE UNITED STATES BANKRUPTCY COURT
DISTRICT OF MARYLAND
GREENBELT DIVISION

IN RE:

FRANCISCO ROMERO
ADA MIRIAM ZAMBRANO

Case No. 11-18749-WIL
Chapter 7

DEBTORS

MARYLAND DEPARTMENT OF
LABOR, LICENSING & REGULATION,

PLAINTIFF,

v.

Adv. Pro. No. 11-00424-WIL

ADA MIRIAM ZAMBRANO

DEFENDANT,

MOTION FOR APPROVED SETTLEMENT

The Plaintiff, Maryland Department of Labor, Licensing and Regulation ("DLLR"), by its undersigned counsel, and the Defendant, Ada Miriam Zambrano (the "Debtor"), have agreed as follows:

1. The above captioned adversary proceeding was opened to determine the dischargeability of a debt alleged to be owed by the Debtor.

2. DLLR claimed Sixteen Thousand Six Hundred Twenty Dollars and Six Cents ($16,620.06) on its original complaint filed on June 02, 2011 and its amended complaint filed on September 23, 2011.

3. The Pre Trial Conference was held before the Honorable court on November 09, 2011 at 10:00 a.m.

4. On April 11, 2012 at 11:30 a.m., both parties' through counsel discussed a final settlement and by April 13, 2012 had reached a final settlement. The settlement provides for the Debtor to pay the amount of Five Thousand Five Hundred Dollars ($5,500.00) to DLLR as full and complete payment of all claims of DLLR against the Debtor.

5. The final settlement amount of Five Thousand Five Hundred Dollars ($5,500.00) will be held herein to be nondischargeable under Section 523 of the United States Bankruptcy Code.

a. The terms of the settlement are as follows:

a. The Debtor's counsel shall turnover all sums in his possession to DLLR through its counsel within Ten (10) days after the entry of a final Order approving the settlement, with the Debtor's counsel being in possession of the amount of One Thousand Six Hundred Dollars ($1,600.00) as of July 6, 2012;

b. The Debtor shall pay the minimum amount of $200.00 per month to DLLR commencing on the 1st day of the month following the date of the turnover described in Subparagraph 6.a. hereof and continuing on the 1st day of each month thereafter until the total amount of Five Thousand Five Hundred Dollars ($5,500.00) shall been paid in full. The Debtor shall pay the foregoing amounts to DLLR by mail or in person at an address to be provided by DLLR; and

c. No interest shall accrue on any portion of the amount of the Five Thousand Five Hundred Dollars ($5,500.00) and there shall be no prepayment penalty imposed on the Defendant to the extent the amount is paid sooner than contemplated hereunder.

WHEREFORE, the Plaintiff, Maryland Department of Labor, Licensing and Regulation prays:

1. That the foregoing described settlement be approved herein, and

2. That it be granted such other and further relief as this Court may seem just and proper.

/s/RoopeshVijayan

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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that this consent order has been send to U.S. Trustee, and Defendant's Counsel electronically and/or by first class mail, postage prepaid on July 6, 2012.

Gerard R. Vetter, Esquire
Assistant U.S. Trustee
Office of the U.S. Trustee
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Bud Stephen Tayman, Esquire
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/s/ Roop Vijayan
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